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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

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APR 15 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
FM Table of Allotments) MM Docket No. 04-67
FM Broadcast Stations) RM - 10856
(Pittsfield and East Hampton, Massachusetts)
and Malta, New York)

To The Commission

**JOINT COMMENTS OF VOX NEW YORK, LLC
AND GREAT NORTHERN RADIO, LLC**

1. Vox New York, LLC ("Vox New York"), licensee of WNYQ(FM), Malta, New York, and Great Northern Radio, LLC ("Great Northern"), licensee of WBEC-FM, Pittsfield, Massachusetts (collectively, the "Joint Petitioners"), by their counsel, hereby submit these Joint Comments filed in connection with the Notice of Proposed Rule Making issued in this proceeding.¹ The Joint Petitioners hereby reiterate their interest in implementing the proposed allotments outlined in their Petition for Rule Making ("Petition").² The Petition proposes the reallocation of Channel 288A from Pittsfield to Easthampton, Massachusetts, with a modification of the license for WBEC-FM to reflect the change in community of license. As the Petition notes, the proposed substitution would provide first local service to Easthampton, while Pittsfield would retain broadcast transmission service through the current service provided by three AM and three FM stations. The Petition further proposes the substitution of Channel

¹ See *In the Matter of Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations (Pittsfield and Easthampton, Massachusetts and Malta, New York)*, MM Docket No. 04-67 (RM-10856) (rel. March 12, 2004)

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289B1 for Channel 289A at Malta, New York with a change in facilities for WNYQ(FM) to the upgraded facilities.

2. The Joint Petitioners reaffirm that the proposal will serve the public interest. Each proposed allotment is mutually exclusive with the existing allotments and will provide the requisite coverage to the communities involved. The Petition will result in a preferential arrangement of allotments consistent with the FM Allotment Priorities by providing Easthampton with its first local aural transmission service without depriving Pittsfield of its first local aural transmission service and permitting WNYQ(FM) to provide wide area service.³

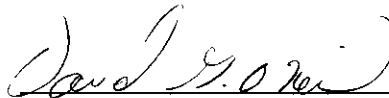
3. For the foregoing reasons, the Joint Petitioners respectfully request approval of the proposed amended allotments outlined in the Petition. Should the Commission implement the proposed changes to the FM Table of Allotments, Vox New York and Great Northern Radio will timely file the necessary applications for construction permit for the new channel allotments and will construct the new facilities in a timely manner.

² See *Petition for Rule Making of Vox New York, LLC and Great Northern Radio, LLC* (filed May 29, 2003)

³ See *Revision of FM Assignment Policies and Procedures ("FM Allotment Priorities")*, 90 FCC 2d 88 (1982), *recon demed*, 56 RR 2d 448 (1983).

WHEREFORE, FOR THE FOREGOING REASONS, Vox New York, LLC and Great Northern Radio, LLC respectfully request that the Commission issue an Order in the instant proceeding granting the proposal outlined in the May 29, 2003 Petition for Rule Making and modify Section 73.202(b) of the Commission's Rules accordingly.

Respectfully submitted,



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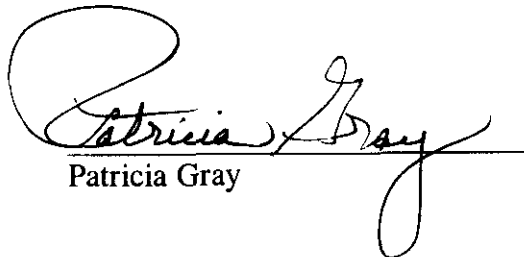
April 15, 2004

Certificate of Service

I, Patricia Gray, a secretary in the law firm of Rini Coran, PC, do hereby certify that on this 15th day of April, 2004, I caused copies of the foregoing "Joint Comments of Vox New York, LLC and Great Northern Radio, LLC" to be hand delivered, addressed to the following persons:

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Patricia Gray